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September 16, 2022

Via ECF:

The Honorable Lois Bloom, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **Najera et al v. SR Mango House Inc. et al**
Civil Docket No.: 22-cv-01051-RPK-LB

Dear Judge Bloom:

We represent the Plaintiffs, Andres Najera, Mario Avila, and Elpidio Munguia, individually and on behalf of all others similarly situated (“Plaintiffs”) in this FLSA matter, and we respectfully submit this letter to apprise The Court on the status of this matter.

As an initial matter, we apologize to the Court for overlooking the Court’s deadlines within the August 16, 2022 Order. Our office had some scheduling issues meeting with our clients to verify the necessary information for the anticipated Amended Complaint.

On August 15, 2022, we apprised the Court, *inter alia*, that “it is necessary to amend the Complaint herein to add additional Defendants before mediation in this matter would be productive.” *See* Dkt. No. 20. The Court granted Plaintiffs’ request on August 16, 2022, and directed Plaintiffs to file their motion to amend, and proposed Amended Complaint by August 30, 2022; and the original Defendants shall respond to the Amended Complaint by September 9, 2022.

We are now prepared to file our Amended Complaint and to serve same on Defendants. We can file the Amended Complaint by Monday, September 19, 2022.

After conferring with Defendants’ counsel, the named Defendants anticipate being able to interpose an Answer to the Amended Complaint by October 19, 2022. We will promptly serve the additional Defendants upon the summons being issued.

The parties can still file the requested letter regarding mediation on or before September 28, 2022.

We thank the Court for its kind consideration on this matter, and we remain available to provide any additional information.

Respectfully submitted,

Roman Avshalumov
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CC:

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